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7 Illinois Union Insurance Company

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10 UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA
11
12 SAN FRANCISCO DIVISION

13
14 ILLINOIS UNION INSURANCE COMPANY,
15 an Illinois corporation,

16 Plaintiff,

17 v.

18 INTUITIVE SURGICAL, INC., a Delaware
19 corporation,

Defendant.

20
21 AND CONSOLIDATED ACTIONS

22 Case No.: 3:13-cv-04863-JST

23 **JOINT STIPULATION TO EXTEND
TIME TO FILE OPPOSITION AND
REPLY BRIEFS (PLAINTIFF
INSURERS' MOTIONS FOR
SUMMARY JUDGMENT RE:
RESCISSON); and**

24 **[PROPOSED] ORDER.**

25 Plaintiffs Illinois Union Insurance Company ("Illinois Union") and Navigators Specialty
26 Insurance Company ("Navigators") (collectively the "Insurers") and Defendant Intuitive Surgical,
27 Inc. ("Intuitive") jointly stipulate, pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, to extend the
time to file any opposition and reply briefs regarding the Insurers' summary judgment motions on
rescission (the "Motions").

28 WHEREAS, on March 15, 2016, Illinois Union and Navigators filed and served their Motions
and set the Motions for hearing on May 26, 2016;

1 WHEREAS, as currently scheduled, Intuitive's oppositions to the Insurers' Motions would be
2 due March 29, 2016 and the Insurers' replies would be due April 5, 2016;

3 WHEREAS, all parties have agreed to a mutual one-week extension for both Intuitive's
4 oppositions and the Insurers' replies;

5 Now therefore, the parties, through their undersigned counsel, hereby stipulate as follows:

6 • That the deadline for filing any opposition(s) to the Insurers' Motions be extended by
7 one week to April 5, 2016; and

8 • That the deadline for filing any reply(ies) in support of the Insurers' Motions be
9 extended by one week to April 19, 2016.

10
11 DATED: March 16, 2016

12 COZEN O'CONNOR

13 By: /s/ Charles E. Wheeler
14 Attorneys for Plaintiff ILLINOIS UNION
15 INSURANCE COMPANY

16 HINSHAW & CULBERTSON LLP

17 By: /s/ John S. Pierce
18 Attorneys for Plaintiff NAVIGATORS SPECIALTY
19 INSURANCE COMPANY

20 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

21 By: /s/ James P. Schaefer
22 Attorneys for Defendant INTUITIVE SURGICAL, INC.

23
24 Pursuant to Civil Local Rule 5-1(i), the filer attests that concurrence in the filing of this
25 document has been obtained from the signatories above.

26
27 /s/ Charles E. Wheeler

[PROPOSED] ORDER

**PURSUANT TO THE FOREGOING STIPULATION OF THE PARTIES, IT IS
HEREBY ORDERED THAT:**

1. The deadline for filing any opposition(s) to the Insurers' Motions for summary judgment on rescission be extended by one week to April 5, 2016; and
2. The deadline for filing any reply(ies) in support of the Insurers' Motions for summary judgment on rescission be extended by one week to April 19, 2016.

IT IS SO ORDERED.

DATED: March 16, 2016

~~The Honorable Jon. S. Tigar
United States District C~~

APPROVED
Jon. Tigar
Judge Jon S. Tigar